

June 30, 2006

VIA ELECTRONIC DELIVERY AND U.S. MAIL

Alessandro A. Iuppa, Superintendent
Attn: Vanessa J. Leon
Docket No. INS-06-900
Maine Bureau of Insurance
34 State House Station
Gardiner, Maine 04333-0034

In Re: Review Of Aggregate Measurable Cost Savings Determined By Dirigo Health
For The Second Assessment Year

FILING COVERSHEET

Dear Superintendent Iuppa:

Enclosed for filing please find the following:

SUBMITTED BY: Anthem BCBS, Maine Association of Health Plans, Maine
Automobile Dealers Insurance Trust and Maine State Chamber of
Commerce

DATE: June 30, 2006

DOCUMENT TITLE: Joint Response to CAHC Concerning Undisclosed Affiliations of
Dirigo Board Member

DOCUMENT TYPE: Letter

CONFIDENTIAL: **NO**

Thank you for your assistance in this matter.

Very truly yours,

/s/ Counsel for Intervenors

NON-CONFIDENTIAL

STATE OF MAINE
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION
BUREAU OF INSURANCE

IN RE:)	
)	
REVIEW OF AGGREGATE)	JOINT RESPONSE TO CAHC
MEASURABLE COST SAVINGS)	CONCERNING UNDISCLOSED
DETERMINED BY DIRIGO HEALTH)	AFFILIATIONS OF DIRIGO BOARD
FOR THE SECOND ASSESSMENT)	MEMBER
YEAR)	
)	
Docket No. INS-06-900)	
)	June 30, 2006

NON-CONFIDENTIAL

Dear Mr. Superintendent:

Counsel for Intervenors Anthem Health Plans of Maine, Inc., Maine State Chamber of Commerce, Maine Association of Health Plans, and Maine Automobile Dealers Association Insurance Trust ("Intervenors") are in receipt of CAHC's reply. While the majority of CAHC's argument does not warrant a response, Intervenors respond briefly to counsel's suggestions that (1) Intervenor counsel were aware of Mr. McCann's affiliation with CAHC prior to the June 16 letter and waited in ambush to raise this issue; and (2) the filing is defective because Intervenors provided no basis for redress by the Superintendent.

First, by signing below, the undersigned affirm that each first learned of Mr. McCann's membership on the CAHC Board through the June 16, 2006 letter and the investigation performed thereafter. Period.

Second, the redress we requested of the Superintendent was straightforward: any deference accorded to an agency is premised on the presumption that the findings and determinations were made by an unbiased, neutral agency. That fundamental proposition needs no citation, but in the event the Superintendent wishes briefing on this point, we can certainly provide it.

CAHC does not deny, indeed now confirms, that Mr. McCann is a current member of its Board of Directors. That fact was not disclosed to counsel in this hearing, despite the recusals outlined in our initial joint letter. If it had been disclosed, Intervenor counsel certainly would have objected to Mr. McCann's participation in the deliberations and vote on this matter. Because the facts are now undisputed, the Superintendent should accord no deference to any of the Board's findings of fact and conclusions of law.

DATED: June 30, 2006

Respectfully submitted,

/s/ Christopher T. Roach
Christopher T. Roach, Esq.
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/s/ D. Michael Frink
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Counsel for Maine Automobile Dealers Association Insurance Trust

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 30, 2006, a copy of Intervenor's Joint Response to CAHC Concerning Undisclosed Affiliations of DHA Board Member was served on each of the persons listed below.

Compass Health Analytics, Inc.
ATTN: Jim Highland
465 Congress Street, 7th Floor
Portland, ME 04101

Thomas C. Sturtevant, Jr.
Assistant Attorney General
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6 State House Station
Augusta, ME 04333-0006

Alessandro A. Iuppa, Superintendent
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INS-06-900
Bureau of Insurance
Maine Department of Professional and
Financial Regulation
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William Laubenstein, Esquire
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DATED: June 30, 2006

/s/ Counsel for Intervenor
Counsel for Intervenor